

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

DEIRDRE YOUNG,

Plaintiff

v.

Civil Case No. 1:23cv00445-PTG-JFA

**WASHINGTON GAS LIGHT
COMPANY, *et al.***

Defendants

WASHINGTON GAS LIGHT COMPANY'S TRIAL EXHIBIT LIST

Pursuant to this Court's Order of October 6, 2023 (Docket No. 22), Defendant Washington Gas Light Company ("Washington Gas"), by undersigned counsel, respectfully submits the following list of potential exhibits for the trial of the above-captioned matter. Washington Gas reserves the right to elect not to seek the introduction of any of these exhibits at trial, and to rearrange the numbering sequence prior to trial.

EXHIBITS

This list does not include exhibits that Defendant might seek to introduce as impeachment or rebuttal evidence. Defendant reserves the right to use demonstrative exhibits during the testimony of certain of its witnesses at trial. The exhibit list below reflects the present status of this case. Accordingly, Defendant reserves the right to amend this list—including eliminating proposed exhibits—should further litigation developments (including, *inter alia*, positions advanced by Plaintiff) warrant. Copies of all listed exhibits have been previously produced to Plaintiff and to codefendant Temporary Solutions and have also been identified by Bates numbers.

No.	Bates No.	Description
1	WGL0000141-143	Statement of Work – Number: Technical Training Proctoring – effective April 2019
2	WGL0000144	Handwritten Thank You note from Plaintiff to Thomas Robb
3	WGL0000145-147	July 16, 2020 – August 7, 2020 email correspondence between E. Roller, H. Anzano, C. Clokus and A. Dobson re: WGL Investigation
4	WGL0000148-149	March 17 – 18, 2020 email exchange between K. Dunn and H. Anzano
5	WGL0000150-151	March 18, 2020 and May 22, 2020 emails from K. Dunn to Washington Gas Security re: Temporary Badge Deactivation
6	WGL0000152-154	March 2020 letter to all WGL Employees and Annual Notification: How to Report Harassment and Discrimination
7	WGL0000155-158	Organization Chart – OQ & Education Technology
8	WGL0000057-058	April 6 and April 10, 2020 emails regarding Distribution of EEO Cascade for 2020
9	WGL0000059-060	April 20, 2020 Corporate Communications – A Message from Washington Gas Director, Employment and Labor Relations re: EEO documents
10	WGL0000137-140	June 11, 2020 letter addressed to Washington Gas Attn: Human Resources Department with typewritten signature of Plaintiff
11	WGL0000159-161	March 2020 text messages from T. Robb to D. Young
12	WGL0000163-164	Table of contractors with hire dates through June 2020
13	WGL0000164-165	July 16, 2020 email exchange between E. Roller, A. Dobson, P. Tomko and H. Anzano
14	WGL0000166	Robb Policy and 2021 EEO Cascade Acknowledgments
15	WGL0000167-223	Washington Gas Position Statement submitted to the EEOC re Deidre Young v. Washington Gas Light Co., EEOC Charge No. 570-2020-02393

16	WGL0000226-231	Proctor – Robb Investigation Summary
17	WGL0000232-233	May 21, 2020 email from K. Dunn to H. Anzano cc to T. Robb re Washington Gas Proctor Details
18	WGL0000236	June 19, 2020 email exchange between E. Roller and T. Robb re: HR matter
19	WGL0000237-238	July 16 and July 20, 2020 email exchange among E. Roller, A. Dobson, P. Tomko, H. Anzano and C. Clokus re: WGL Investigation
20	WGL0000241	June 16, 2020 email from E. Roller to K. Dunn re: Availability to discuss HR matter
21	WGL0000242-243	October 30, 2020 Written Warning to T. Robb
22	WGL0000244-245	June 18, 2020 email correspondence including E. Roller, H. Anzano, A. Dobson, P. Tomko, L. Padgett re: WGL Investigation
23	TS000133-136	Plaintiff's payroll information for her placement with Washington Gas
24	TS000138-139	August 27, 2019 email exchange between K. Dunn and H. Anzano re Deidre Young
25	TS000140	March 17 and March 18, 2020 email exchange between K. Dunn and H. Anzano re update
26	TS000202-204	Payroll information for proctors placed at Washington Gas during Plaintiff's placement
27	TS000001-002	May 6, 2020 email exchange between K. Dunn and H. Anzano re Proctors
28	TS000003-007	June 15 – July 20, 2020 email correspondence between P. Tomko and Plaintiff, C. Clokus and Anzano re Temporary Solutions

DATED: February 21, 2024

Respectfully submitted,

STINSON LLP

By: /s/Grant E. Mulkey

Grant E. Mulkey

Virginia State Bar No. 82452

1201 Walnut Street

Suite 2900

Kansas City, MO 64106

Telephone: 816.691.3203

Fax: 816.412.8124

grant.mulkey@stinson.com

Bernadette C. Sargeant

Admitted Pro Hac Vice

1775 Pennsylvania Avenue, N.W.

Suite 800

Washington, D.C. 20006

202.728.3018

bernadette.sargeant@stinson.com

Counsel of Record for Defendant

Washington Gas Light Company

CERTIFICATE OF SERVICE

I hereby certify that on February 21, 2024, I filed Defendant Washington Gas Light Company's Trial Exhibit List using the Court's CM/ECF system, which will send a notice of electronic filing to all parties of record.

DATED: February 21, 2024

Respectfully submitted,

STINSON LLP

By: /s/Grant E. Mulkey
Grant E. Mulkey
Virginia State Bar No. 82452
1201 Walnut Street
Suite 2900
Kansas City, MO 64106
Telephone: 816.691.3203
Fax: 816.412.8124
grant.mulkey@stinson.com